

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Claire C. Cecchi, U.S.D.J.
v.	:	Crim. No. 19-877
MATTHEW BRENT GOETTSCHE,	:	
RUSS ALBERT MEDLIN,	:	
JOBADIAH SINCLAIR WEEKS	:	
JOSEPH FRANK ABEL, and	:	
SILVIU CATALIN BALACI	:	
Defendants.	:	

**FIFTH FORFEITURE BILL OF PARTICULARS**

The United States of America, by and through Philip R. Sellinger, United States Attorney for the District of New Jersey (Joseph N. Minish, Assistant U.S. Attorney, appearing), submits this Fifth Forfeiture Bill of Particulars, pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure, to restate, supplement, and clarify the forfeiture allegations contained in the Indictment, Crim. No. 19-877, and to provide notice to defendants Matthew Brent Goettsche and Russ Albert Medlin of specific property the Government intends to forfeit upon conviction.

1. The allegations set forth in the Indictment are realleged and incorporated herein by reference for the purpose of alleging forfeiture, pursuant to Federal Rule of Criminal Procedure 32.2(a) and 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

2. Property subject to forfeiture in this case to the United States, pursuant to Federal Rule of Criminal Procedure 32.2(a) and 18 U.S.C. §

981(a)(1)(C) and 28 U.S.C. § 2461(c), includes, but is not limited to the property listed in the schedule attached hereto as Exhibit A.

This notice does not limit the Government from seeking the forfeiture of additional specific property or limit the Government from seeking the imposition of a forfeiture money judgment.

Dated: Newark, New Jersey  
January 5, 2023

Philip R. Sellinger  
United States Attorney

s/ Joseph N. Minish  
By: Joseph N. Minish  
Assistant United States Attorney

**EXHIBIT A**

- a) Bombardier Inc., Model CL-600-2B16 Challenger 604, serial number 5416, tail number VH-UBQ, with two General Electric engines, both model CF-34-3B, with serial numbers 872463 and 872489, including all related aircraft maintenance logbooks consisting of airframe, powerplant and engine, and flight logbooks;
- b) proceeds from the sale of Bombardier Inc., Model BD-700-1A10 Global Express, serial number 9055, tail number VH-UBX, with two Rolls Royce Deutschland Ltd & Co. engines, both model BR-710A2-20, with serials 12216 and 12219, including all related aircraft maintenance logbooks consisting of airframe, powerplant and engine, and flight logbooks;
- c) proceeds from the sale of Learjet Inc., Model 60, serial number 411, tail number VH-RDI, with two Pratt and Whitney PW305A engines, serial numbers PCE-CA0684 and PCE-CA0685, including all related aircraft maintenance logbooks consisting of airframe, powerplant and engine, and flight logbooks;
- d) the balance of loan principal owed by Bluemountain, Inc. to Bitwealth Holdings LLC and Bitwealth Utah LLC;
- e) the balance of loan principal owed by UVI International, Ltd to Matthew Brent Goettsche;
- f) an investment by Bitwealth Holdings LLC in a business venture named Notis LLC in the amount of \$430,000;
- g) an investment by Bitwealth Holdings LLC in a business venture named Curza Global LLC in the amount of \$250,000;
- h) an investment by Getch Foundation LLC in a business venture named Crowdsmart, Inc. in the amount of \$250,000;
- i) an investment by Bitwealth Holdings LLC in a business venture named Snowfish RG, LLC in the amount of \$750,000;
- j) all digital currency held in the Coinbase account of Kobre & Kim LLP that was previously held in Bitcoin wallet address [REDACTED] xtc owned by Matthew Goettsche;
- k) all fiat currency held by Kobre & Kim LLP derived from the sale of digital currency previously held in Bitcoin wallet address [REDACTED]

[REDACTED] lxtcr and Bitcoin Cash  
wallet address [REDACTED] wtj0,  
both owned by Matthew Goetsche;

- l) all fiat currency held by Smith Villazor LLP derived from the sale of digital currency previously held in bitcoin wallet address [REDACTED] lxtcr owned by Matthew Goetsche;
- m) \$1,115,245 in United States currency seized by the Drug Enforcement Administration on August 12, 2020 from a residence at 2745 Stargate Street, Las Vegas, Nevada; and
- n) 3.20625629 bitcoins seized from a Bitcoin wallet controlled by Michael Goetsche on December 10, 2019.